

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In re :</b>	<b>:</b>	<b>Chapter 7</b>
<b>Joanne Comero,</b>	<b>:</b>	
	<b>Debtor.</b>	<b>:</b>
		<b>Case No. 13-11771(JKF)</b>
<hr/>		
<b>Sheila &amp; Ajay Jani,</b>	<b>:</b>	
	<b>Plaintiffs,</b>	<b>:</b>
	<b>v.</b>	<b>:</b>
<b>Joanne Comero,</b>	<b>:</b>	
	<b>Defendant.</b>	<b>:</b>
		<b>Adversary No. 13-0321</b>

**MOTION FOR LEAVE TO WITHDRAW APPEARANCE  
AS COUNSEL FOR DEFENDANT**

Scott F. Waterman, counsel for the Defendant (“Movant”) moves this Honorable Court for Leave to Withdraw his Appearance as counsel for Defendant, Joanne Comero (“Client”), and in support thereof states as follows:

1. Movant was retained by the Client to represent her in this adversary action.
2. Movant has undertaken such representation.
3. However, Movant is unable to continue to represent the Client because Client has discharged Movant from continuing to represent her and has instructed Movant to file this Motion to Withdraw forthwith.
4. As a result Movant is compelled to withdraw as counsel for the Defendant. Pennsylvania Rule of Professional Conduct. 1.16(a)(3).

5. There are no unanswered motions at present. There is, however, a requirement to file a Joint Pretrial Statement, which has been drafted but not consented to by the Plaintiffs. A Pretrial Conference is Scheduled for July 8, 2014.

6. Should the Court grant Movant's Motion to Withdraw as Counsel for Defendant at this time, Defendant will have an ample opportunity to obtain replacement counsel, if she so chooses.

**WHEREFORE**, Movant respectfully requests Leave to Withdraw his Appearance as attorney for Defendant in this matter.

**IANNELLO, WATERMAN & MUIR, LLP.**

**BY:** /s/ Scott F. Waterman  
**SCOTT F. WATERMAN**

Attorney for Defendant  
110 West Front Street  
Media, PA 19063  
(610) 566-6177 Phone  
(610) 892-6991 Fax

Dated: June 23, 2014